

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO.: C-21-1022 (1)
	§	
SAVANNAH MIKAYLA JACOBS	§	

STIPULATION OF FACT

The Defendant, Savannah Mikayla Jacobs, has agreed to stipulate with the United States Attorney for the Southern District of Texas, Jennifer B. Lowery, through the undersigned Assistant United States Attorney, to the following facts and expected testimony concerning the violation of Title 8, U.S. Code, § 1324(a)(1)(A)(ii), § 1324(a)(1)(A)(v)(I), and § 1324(a)(1)(B)(i) alleged in Count One of the above-numbered Indictment. The parties agree that these facts are sufficient to establish a factual basis for the Defendant's plea, pursuant to Fed. R. Crim. P. 11(b)(3). The parties further agree that other facts exist, and those facts may be relevant at sentencing.

I.

The Defendant confesses that, within the Southern District of Texas, on or about November 13, 2021:

1. the Defendant and at least one other person made an agreement to commit the crime of knowingly transporting an illegal alien within the United States in furtherance of the alien's unlawful presence;
2. the Defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and

3. one of the conspirators during the existence of the conspiracy knowingly committed some act in furtherance of the conspiracy.

II.

The Defendant, Savannah Mikayla Jacobs, further stipulates and agrees that, had the case proceeded to trial, the United States would have produced evidence as outlined below, and would have called witnesses to testify that:

On November 13, 2021, Savannah Mikayla Jacobs drove a black 2014 Ford Focus sedan into the primary inspection area of the United States Border Patrol Checkpoint located near Sarita, Texas. Border Patrol agents observed a single passenger inside the sedan with Jacobs: Sierra Cheyenne Weaver. A Border Patrol service canine, which was conducting free-air sniffs of the inspection area, alerted to the rear of Jacobs's sedan. Following the alert, agents directed the sedan to the secondary inspection area. In the secondary inspection area, agents conducted a search of the sedan and discovered three individuals concealed inside the trunk. Border Patrol agents determined that all three individuals found inside the trunk were citizens of Honduras and Mexico and were illegally present in the United States.

Upon being apprehended, Weaver stated to Border Patrol agents that: Weaver and Jacobs drove from San Antonio to the Rio Grande Valley together. Although Jacobs was driving the Ford Focus, Weaver is the registered owner of the sedan. Upon arriving at a gas station in the Rio Grande Valley, they picked up the three individuals discovered inside the sedan's trunk. After picking up the individuals, Weaver and Jacobs headed back north.

One of the individuals found inside the sedan's trunk, Oscar Uriel Romero-Carmona — a material witness and Mexican national — stated to Border Patrol agents that: Romero-Carmona illegally crossed the border through Matamoros, Mexico on November 9, 2021, and was taken to

a hotel where he stayed until November 13, 2021. Romero-Carmona was dropped off at a parking lot where awaited a black Ford Focus to pick him up and transport him to Houston, Texas. Romero-Carmona was told to climb into the trunk; he was inside of the trunk with two other individuals. Romero-Carmona identified both Jacobs and Weaver as the individuals who were transporting him to Houston in the Ford Focus.

Therefore, as part of this factual basis, Savannah Mikayla Jacobs, admits and confesses that on November 13, 2021, she did knowingly and willfully conspire to transport an alien within the Southern District of Texas in furtherance of the aliens' unlawful presence in the United States.

III.

The parties hereto agree that the United States could prove the above facts beyond a reasonable doubt.

The undersigned have thoroughly reviewed, understand, and agree that the information contained in this Stipulation of Fact is true and correct.

Elizabeth A. O'Connell w/p/f

SAVANNAH MIKAYLA JACOBS
Defendant

JENNIFER B. LOWERY
UNITED STATES ATTORNEY

Elizabeth A. O'Connell

Attorney for the Defendant

By: *John G. Marck*

JOHN G. MARCK
Assistant United States Attorney